

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

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KELLI FLOREK,

Plaintiff,

v.

CREIGHTON UNIVERSITY, KATIE  
WADAS-THALKEN, RHONDA JONES  
a/k/a RHONDA REESON and MARYANN  
SKRABAL,

Defendants.

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CASE NO. 8:22-cv-00194-MDN

**NOTICE OF INTENT TO SERVE  
SUBPOENAS DUCES TECUM**

**TO: Plaintiff, Kelli Florek in care of her attorney, Jason J. Bach**

Defendants Creighton University, Katie Wadas-Thalken, Rhonda Jones, and Maryann Skrabal, by and through their attorneys of record, hereby serves notice that they will serve a Subpoena Duces Tecum on or about February 23, 2023<sup>1</sup>, to each of the following:

Gregory Harmon, RPh  
**Kamehameha Pharmacy, LLC**  
54-3877 Akoni Pule Hwy  
Kapaau, HI 96755

Dr. Linda Rayner  
**HMSA's Online Care**  
Care on Demand  
1993 S. Kihei Rd., Ste. 216  
Kihei, HI 96753

Brian Adams, NP  
**Hi-Desert Medical Center**  
6601 White Feather Road  
Joshua Tree, CA 92252

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<sup>1</sup> Defendants' counsel has conferred with Plaintiff's counsel and Plaintiff's counsel has agreed to waive the advanced notice requirement.

Natalie K. Kong, MD  
Jennifer Hashimoto  
Lokenani Souza, APRN-RX  
Darrin J. Kuczynski MD  
Kimberly Schueler, APRN-RX  
**North Hawaii Community Hospital Primary Care Clinic**  
67-1267 Kawaihae Road  
Kamuela, Hawaii 96743

Doug Hiller, MD  
**Orthopedic Associates**  
**North Hawaii Community Hospital Primary Care Clinic**  
67-1267 Kawaihae Road  
Kamuela, Hawaii 96743

**Allan Wang, MD**  
75-166 Kalani St #204  
Kailua-Kona, HI 96740

commanding them to produce the items listed on the relevant exhibits to the Subpoenas (which will be sent to Plaintiff's counsel).

The responsive documents can be produced in person to Baird Holm LLP on March 15, 2023 at 10:00 a.m. **In lieu of hand delivery, responsive documents may be mailed to Baird Holm LLP, Attn: Leigh Campbell Joyce, 1700 Farnam St, Ste. 1500, Omaha, NE 68102 or emailed to [lcampbell@bairdholm.com](mailto:lcampbell@bairdholm.com) on or before March 15, 2023.**

Dated this 22nd day of February, 2023.

CREIGHTON UNIVERSITY, KATIE WADAS-  
THALKEN, RHONDA JONES A/K/A RHONDA  
REESON AND MARYANN  
SKRABAL, Defendants,

By: /s/Leigh Campbell Joyce  
Scott Parrish Moore (NE# 20752)  
Leigh Campbell Joyce (NE# 26218)  
of BAIRD HOLM LLP  
1700 Farnam Street  
Suite 1500  
Omaha, NE 68102-2068  
Phone: 402-344-0500  
[lcampbell@bairdholm.com](mailto:lcampbell@bairdholm.com)  
[spmooore@bairdholm.com](mailto:spmooore@bairdholm.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Jason J. Bach  
[jbach@bachlawfirm.com](mailto:jbach@bachlawfirm.com)

and I hereby certify that I have mailed by United States Postal Service, postage prepaid, this document to the following non CM/ECF participants:

None.

/s/ Leigh Campbell Joyce

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